|              |  | DP Barcode:_  | D157321                         |
|--------------|--|---|---------------------------------|
|              |  | Shaughnessy   | No.: 105501                     |
|              |  | Date out of   | efgwb: <u>APR 23 <b>199</b></u> |
| TO:          | L. Rossi/C. Peterson Product Manager #50 Registration Division (H7505C)                                      |   |                                 |
| FROM:        | Paul Mastradone, Ph.D., Chief Environmental Chemistry Review Section Environmental Fate and Ground Water Br. | #1/anch   |                                 |
| THRU:        | Hank Jacoby, Chief Environmental Fate and Ground Water Brown Environmental Fate and Effects Division         |   |                                 |
| Attache      | ed, please find the EFGWB review of  |   |                                 |
| Reg./Fi      | le #: 62719-109  |   |                                 |
| Chemica      | 1 Name: N-[5-(1,1-dimethylethyl)1,3,4-   | thiadiazol-2-y  | l]-N'-N'-dimethyl-              |
| <del> </del> | urea   |   |                                 |
| Type Pr      | oduct: <u>Herbicide</u>  | <del>, januaria kata kata kata kata kata kata kata ka</del> |                                 |
| Common       | Name: Tebuthiuron  | ·   |                                 |
| Company      | Name:DowElanco   |   |                                 |
| Purpose      | :To review an aquatic field dis  | sipation proto  | ocol                            |
| Date Re      | ceived: 8 May 1991   | Date Complet  | ed: <u>11 May 1991</u>          |
| Action       | Code: 665  |   |                                 |
| EFGWB #      | e(s):91-0072   |   |                                 |
| Total R      | deviewing Time: 0,4 day  |   |                                 |
| Deferra      | ls to:Ecological Effects Branch, EFE   | )   |                                 |
|              | Science Integration and Policy   | Staff, EFED   |                                 |
|              | Non-Dietary Exposure Branch, H   | ED  | •                               |
|              | Dietary Exposure Branch, HED   |   |                                 |
|              | Toxicology Branch  | ·   |                                 |

#### 1. CHEMICAL:

Chemical name: N-[5-(1,1-dimethylethyl)1,3,4-thiadiazo1-2-yl]-N'-N'-

dimethylurea

CAS no .:

34014-18-1

Common name:

Tebuthiuron

Trade name:

Spike

Chemical structure:

# Physical/Chemical properties of active ingredient:

Physical characteristics: White crystalline, odorless powder, color-

less solid

Molecular formula:

C9H16ON4S

Molecular weight:

228

Melting point:

161.5 to 164°C

Vapor Pressure:

 $2 \times 10^{-6} \text{ mm Hg } (25^{\circ}\text{C})$ 

Solubility:

2.5 ppm (25°C,pH 7)

Log octanol/water partition coefficient: 1.79

#### 2. TEST MATERIAL:

N/A

#### 3. STUDY/ACTION TYPE:

To review an aquatic field dissipation protocol

#### 4. STUDY IDENTIFICATION:

Stone, C.T. PROTOCOL FOR AN AQUATIC FIELD DISSIPATION STUDY OF TEBUTHIURON STUDY SITES: PIERCE, TEXAS AND VAN WERT, OHIO. Prepared by The Johnson Company, Inc., Montpelier, VT; Submitted by DowElanco, Greenfield, IN; Document completed September 1990; Received by EPA October 1990.

#### 5. REVIEWED BY:

Gail Maske Chemist, Review section #1 OPP/EFED/EFGWB

6. APPROVED BY:

Paul Mastradone Chief Review section #1 OPP/EFED/EFGWB Signature: 23

Signature:

Date:

#### 7. **CONCLUSIONS:**

The registrant, DowElanco, is submitting an aquatic field dissipation protocol for review prior to initiating an aquatic field dissipation study to full the data requirement for registration. Based on a review of the submitted protocol, the following should be included in an acceptable study:

- a. Storage stability data using either spiked field or spiked laboratory samples to determine the stability of tebuthiuron and its residues under storage conditions described in study must be furnished.
- b. Sampling intervals must be adequate to determine half-lives of parent and major degradates under field conditions.
- c. The formation and decline of degradates and parent must be fully addressed.
- d. Sample preparation (e.g. extractions, etc.) and analytical methodology must be described in detail.

In addition, the registrant should bear in mind that in a supplemental aquatic field dissipation study previous submitted, tebuthiuron degraded in water with a reported half-life of between 77 and 170 days. However, dissipation was negligible after 64 days. Therefore, first order dissipation probably does not accurately indicate the half-life. The actual half-life of tebuthiuron may be greater than reported in the supplemental data. The registrant should satisfactorily address any such observation in the new study.

#### 8. RECOMMENDATIONS:

The registrant should be informed of the following:

Retrospective

- a. The protocol for the aquatic field dissipation study (164-2) appears to adequately reflect the guidelines. However, EFGWB does require the above data be included in an acceptable study.
- b. The status of the Environmental Fate Data Requirements for tebuthiuron for terrestrial food crop uses and aquatic non-food uses is summarized below:

| Environmental Fate |                                     | Status of data                       |          |  |
|--------------------|-------------------------------------|--------------------------------------|----------|--|
| Data Requirements  |                                     | Requirement                          | MRID No. |  |
| Degrad             | ation Studies-lab                   |                                      |          |  |
| 161-1              | Hydrolysis                          | Fulfilled (Reg. Std;01/15/87)        | 00020779 |  |
| 161-2              | Photodegradation in water           | Presently in Review                  | 41305101 |  |
| 161-3              | Photodegradation on soil            | Fulfilled<br>(RJM;09/07/91)          | 41050201 |  |
| 161-1              | Photodegradation in air             | Not Submitted <sup>1</sup>           |          |  |
| Metabo             | lism Studies-lab                    |                                      |          |  |
| 162-1              | Aerobic soil                        | Presently in Review                  | 41328001 |  |
| 162-2              |                                     | Presently in Review <sup>2</sup>     | 41328002 |  |
| 162-3              |                                     | Not Submitted                        |          |  |
| 162-4              | Aerobic aquatic                     | Presently in Review                  | 41372501 |  |
| Mobili             | ty Studies                          |                                      |          |  |
| 163-1              | Leaching, Adsorption/<br>Desorption | Partially <sup>3</sup> (PO;11/07/88) | 40768401 |  |
| 163-2              | Volatility-Lab                      | Not Submitted <sup>1</sup>           |          |  |
| 163-3              | Volatility-field                    | Not Submitted <sup>1</sup>           |          |  |
| Dissip             | ation Studies-field                 |                                      |          |  |
| 164-1              | Soil                                | Not Submitted <sup>4</sup>           | •        |  |
| 164-2              | Aquatic (sediment)                  | Protocol submitted                   |          |  |
| · <del>.</del>     |                                     | (WGM;05/12/91)                       |          |  |
| 164-5              | Soil, long-term                     | Reserved <sup>5</sup>                |          |  |
| Accumu             | lation Studies                      |                                      | •        |  |
| 165-1              | Confined rotational crops           | Not Submitted <sup>6</sup>           |          |  |
| 165-4              | in Fish                             | Not Submitted                        |          |  |
| Ground             | -Water Monitoring Studies           |                                      |          |  |
| 166-2              | Small-Scale ground-water            | Not Submitted                        |          |  |

- <sup>1</sup> Based on the low vapor pressure (2 x  $10^{-6}$  mm Hg) and a toxicological classification of 3, there is sufficient data to support a waiver request for the photodegradation in air, volatility-lab, and volatility-field studies.
- <sup>2</sup> An acceptable anaerobic aquatic metabolism study will fulfill the anaerobic metabolism data requirement.
- The mobility data requirement for only one metabolite, (N-[5-(1,1-dimethylethyl)-1,3,4-thiadiazol-2-yl]-N-methylurea, has been fulfilled. Mobility data should be submitted for the following degradates, as well:

N-[5-(1,1-dimethylethyl)-1,3,4-thiadiazol-2-yl]-N'-methylurea

5-(1,1-dimethylethyl)-2-methylamino-1,3,4-thiadiazol

5-(1,1-dimethylethyl)-2 amino-1,3,4-thiadiazol

N-[5-(1,1-dimethylethyl)-1,3,4-thiadiazol-2-yl]-N-methyl-N'-hydroxymethyl-urea

The mobility data requirement for unaged tebuthiuron has been fulfilled.

- <sup>4</sup> The field dissipation study is needed to understand the routes of dissipation of tebuthiuron in the environment. The study should address EFGWB's three concerns (persistent, mobility, and method of dissipation).
- <sup>5</sup> The long-term soil dissipation study (164-5) is reserved until evaluation of an acceptable soil dissipation study (164-1).
- <sup>6</sup> If there are no field and vegetable crop, aquatic crop, and rotated food crop uses, the confined rotational crops study is not needed.

#### 9. BACKGROUND:

Tebuthiuron is a relatively nonselective herbicide used for the control of broadleaf weeds, grasses, brush, and for spot treatment of woody brush. Tebuthiuron is readily absorbed through roots of broadleaf weeds, grasses, and brush. Application is by broadcast ground or aerial equipment, spot treatment, drop zone or drop zone treatment with a maximum application rate of 6 lb ai/A.

Tebuthiuron is practically non-toxic to birds, fish, honeybees, and aquatic invertebrates.

#### 10. <u>DISCUSSION:</u>

Spike 40P will be applied to two representative sites, Pierce,TX and Van Wert, OH. The application rate will be 6 lbs ai/acre which is the maximum application rate given on the label. In order to ensure that tebuthiuron is uniformally applied across the target area, the application will be done manually using a calibrated hand operated cyclone spreader. The use of standard mechanized equipment may run the risk

of non-uniform application, due to steep slopes adjacent to the ditch. In addition, to ensure the test material reaches the ground surface, all grass will be mowed to a height of one foot or less. The grass clippings will be removed if they form a mat that is of sufficient thickness to prevent the Spike 40P from reaching the ground surface.

Tebuthiuron is generally applied when runoff is at a minimum. Therefore, the application time will be fall/early winter 1990 to reflect this practice.

Each site will be characterized in terms of soils, hydrology, geology, and meteorology. The test system for each site will be clearly defined in terms of surface water, soil, and stream bed sediment which will each be monitored for tebuthiuron and its residues. In addition, weather and flow will be monitored.

The existing soil characterization will be composed of three major steps.

- 1. Examining the soils across each study plot using a soil auge to determine the amount of variability in the soils on each plot.
- 2. Digging soil pits and describing the soils according to standard U.S. Department of Agriculture methodology.
- 3. Sampling the soil horizons for laboratory analysis. Laboratory analysis will include organic matter content, particle size analysis, bulk density, moisture contents at 1/3 and 15 bar, cation exchange capacity, pH, and other parameters.

An in-stream flow measuring device and/or a rating curve will be used to provide volumetric flow rate data. A measuring point will be approximately 50 feet downstream of the downstream edge of the application area and will be fully operational prior to application of herbicide. A second measuring point will be installed approximately 50 to 100 ft upstream of the application area. The flow measuring technique will incorporate a stilling well equipped with a continuous water level recorder.

The water sampling will be set up using an automatic sampler. This will ensure that when a runoff event occurs at a time when the site technician cannot be present, water quality data will be collected.

The soil sampling in the treated area will be conducted on eight occasions (one pretreatment, and 0, 30, 60, 120, 180, 270, and 365 posttreatment). The location of each soil core sample will be facilitated by dividing both 1000 foot application strips into seven and eight sections, respectively, for a total of 15 sections. The samples will be collected to a depth of 12 inches.

The stream bottom sediment will be sampled at each study location site downstream and upstream of the application area. Sampling will occur at identified deposit areas, as well. Three to five sampling zones will be identified, including one upstream of the sampling area. Each sampling zone will be sampled at three locations to a depth of three locations to a depth of three locations to a depth of three inches using a hand held coring device. The stream bottom sediment will be collected at the same frequency as the soil samples (pretreatment and 0, 30, 60, 120, 180, 270, and 365 days posttreatment).

Soil samples will be analyzed by HPLC. The procedure utilizes a limit of  $0.005~\rm ppm$ , and a limit of quantification of  $0.010~\rm ppm$ .

## 11: COMPLETION OF ONE-LINER:

See attached one-liner.

## 12: CBI APPENDIX:

N/A

Last Update on January 17, 1990

[V] = Validated Study [S] = Supplemental Study [U] = USDA Data

Common Name: TEBUTHIURON

Smiles Code:s(c(n1)C(C)(C)C)c(n1)N(C(=0)NC)C

Chem. Name: N-[5-(1,1-DIMETHYLETHYL)-1,3,4-THIADIAZOL-2-YL]-

N', N'-DIMETHYLUREA

Action Type:Herbicide

Trade Names: SPIKE; GRASLAN

(Formul'tn): WP 80%, 40% PELLET; DRY FLOWABLE 20% PELLET, 6% GRANULE

Physical State:

Use : FOR TOTAL VEGETATION WOODY PLANT CONTROL IN NONCROPLAND

Patterns : AREAS AND FOR SPOT TREEATMENT IN PASTURES.

(% Usage) :

Empirical Form: C9H16N4OS

Molecular Wgt.: 228.31 Vapor Pressure: 2.00E -6 Torr

Melting Point: C Boiling Point: C

Log Kow : 1.79 pKa: @ °C

Henry's : E Atm. M3/Mol (Measured) 2.40E-10 (calc'd)

Solubility in ... Comments

Water 2.50E ppm @20.0 °C 3 Acetone E ppm @ .C Acetonitrile E 9 .C ppm Benzene E °C ppm 6 Chloroform E .C ppm 6 Ethanol E ppm 6 .C Methanol E °C ppm 0 Toluene E ppm e .C Xylene E °C ppm @ E .C ppm @ E ppm @

Hydrolysis (161-1)

[ ] pH 5.0:

[ ] pH 7.0:

[V] pH 9.0:>64 DA

[V] pH 3.0:>64 DA

[V] pH 6.0:>64 DA

: Hq[]

[V] = Validated Study [S] = Supplemental Study [U] = USDA Data

| [ ]<br>[V]                    | lysis (161-2, -3, -4) Air : Soil : 39.7 DAYS ON SANDY LOAM Water:RESISTANT; A 25 PPM SOLN :WAS ONLY DEGRADED 2% AFTER :23 DAYS EXPOSURE TO BLACK :LIGHT. |
|-------------------------------|--|
| [S]                           | ic Soil Metabolism (162-1) IN LOAM SOIL AFTER 273 DAYS, CONC. DECREASED FROM INITIAL 8 PPM TO 5.7 PPM  |
| [S]                           | obic Soil Metabolism (162-2)<br>>48 WEEKS IN LOAM SOIL, WITH<br>COMP. 104 AS MAJOR DEGRADATE.  |
| Anaer [ ] [ ] [ ] [ ] [ ] [ ] | obic Aquatic Metabolism (162-3)  |
| Aerob [S] [] [] [] [] [] []   | ic Aquatic Metabolism (162-4)<br>77-170 DAYS, BUT DISSIPATION<br>IS NEGLIGIBLE AFTER 64 DAYS   |

Last Update on January 17, 1990
[V] = Validated Study [S] = Supplemental Study [U] = USDA Data

|  | Partition                          |                         |  | ,               |               |           |
|--|------------------------------------|-------------------------|--|-----------------|---------------|-----------|
|  | SOIL                               | *OM                     | Ka   |                 |               |           |
|  | SAND                               | 0.5                     |  |                 |               |           |
|  | SdIm                               |                         | 0.62   |                 |               |           |
|  | LOAM<br>Cllm                       | 1.8                     | 0.82<br>1.82   |                 |               |           |
|  | (Ka INCRE                          |                         |  |                 |               |           |
| LJ   | (                                  |                         | 0011)  |                 |               |           |
| Soil 1                                     | Rf Factors                         | (163-1)                 |  |                 |               |           |
| rsi  | IN A 12"                           | COLLIMN O               | F FINE SAND  |                 |               |           |
| [ ]  | SOIL LEAC                          | HED WITH                | I 20", THE<br>ED >94% OF                             |                 |               |           |
| [ ]  | LEACHATE                           | CONTAINE                | D >94% OF  |                 |               |           |
|  | THE APPLI                          | ED.                     |  |                 |               |           |
| []   |                                    |                         |  |                 |               |           |
| r 1  |                                    |                         |  |                 |               |           |
| Labora                                     | atory Vola                         | tility (                | (163-2)  |                 |               |           |
| []   |                                    | ,                       |  |                 |               |           |
| [ ]  |                                    |                         |  |                 |               |           |
|  |                                    |                         |  |                 |               |           |
|  | Volatilit                          | y (163-3                | 5)   |                 |               |           |
| []   |                                    |                         |  |                 |               |           |
| r J  |                                    |                         | w  |                 |               |           |
| [S]<br>[]<br>[S]                           | T1/2= 15<br>AND UP TO<br>>33 MONTH | MONTHS 45 MONT S IN LOA | THS IN LOW REAM (FRESNO, () 15 MONTHS IN 104 OCCURRE | MODERATE TO HEA | is tn clav sc | TT.       |
| []   | IN THE TI                          | ME PERIC                | DDS SHOWN.   |                 |               | ED        |
| []   | DEGRADATE<br>IN THE TI             | ME PERIC                | DDS SHOWN.   |                 |               | SD        |
| [ ] [ ] [ ] [ ] Aquat: [ ] [ ] [ ] [ ] [ ] | IN THE TI                          | ME PERIO                | DDS SHOWN.   |                 |               | GD .      |
| [ ] [ ] [ ] [ ] Aquat: [ ] [ ] [ ] [ ] [ ] | IN THE TI                          | ME PERIO                | DDS SHOWN.   |                 |               | <b>SD</b> |
| [ ] [ ] [ ] [ ] Aquat: [ ] [ ] [ ] [ ] [ ] | IN THE TI                          | ME PERIO                | DDS SHOWN.   |                 |               | <b>SD</b> |

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| Long-Term Soil Dissipation (164-5) [ ] [ ]   |
|--|
| Accumulation in Rotational Crops, Confined (165-1) [ ] [ ]   |
| Accumulation in Rotational Crops, Field (165-2) [ ] [ ]  |
| Accumulation in Irrigated Crops (165-3) [ ] [ ]  |
| Bioaccumulation in Fish (165-4) [S] BLUEGILLS OR TROUT; BCF = 4 X AFTER 28 DAY EXPOSURE TO [ ] 1 PPM. AFTER 14 DAYS DEPUR. IT WAS 3 X. |
| Bioaccumulation in Non-Target Organisms (165-5) [ ] [ ]  |
| Ground Water Monitoring, Prospective (166-1) [ ] [ ] [ ] [ ]   |
| Ground Water Monitoring, Small Scale Retrospective (166-2) [ ] [ ] [ ] [ ]   |
| Ground Water Monitoring, Large Scale Retrospective (166-3) [ ] [ ] [ ] [ ]   |
| Ground Water Monitoring, Miscellaneous Data (158.75) [] HAS BEEN FOUND IN SHALLOW GROUND WATERS IN TEXAS. [] []                        |

Last Update on January 17, 1990

[V] = Validated Study [S] = Supplemental Study [U] = USDA Data

| Field Runoff (167-1) [ ] [ ] [ ] [ ]   |         |
|--|---------|
| Surface Water Monitoring (167-2) [ ] [ ] [ ] [ ]   |         |
| Spray Drift, Droplet Spectrum (201-1) [ ] [ ] [ ] [ ]  |         |
| Spray Drift, Field Evaluation (202-1) [ ] [ ] [ ] [ ]  |         |
| Degradation Products   |         |
| Tebuthiuron degrades slowly in soil to compound 104. degradation increases by optimizing microbial growth. | Rate of |

Last Update on January 17, 1990

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#### Comments

Even with a heavy rain and runoff event, only 10 ppb maximum was found in a pond a short distance from the watershed.

After 30 days aging in SdIm, 97% of radio. was present as parent.

Soil Koc = 4

EPA REVIEWS References:

Writer : PJH

# Compound Designations, Structures, and Chemical Names of Reference Compounds

| Compound Designation | Structure   | Chemical Name  |
|----------------------|---|--|
| Tebuthiuron          | (CH <sub>3</sub> ) <sub>3</sub> C-C s C-N-C-N-CH <sub>3</sub> | N-[5-(1,1-Dimethylethyl) 1,3,4-thiadiazol-2-yl]- N,N'-dimethylurea |
|                      | x - <sup>14</sup> C label                                     |  |
| 104                  | (CH <sub>3</sub> ) <sub>3</sub> C-C S C-N-C-NH <sub>2</sub>   | N-[5-(1,1-Dimethylethyl) 1,3,4-thiadiazol-2-yl] N-methylurea       |
| 105                  | (CH <sub>3</sub> ) <sub>3</sub> C-C S C-N-C-N-CH <sub>3</sub> | N-[5-(1,1-Dimethylethyl) 1,3,4-thiadiazol-2-yl]- N'-methylurea     |
| 106                  | (CH <sub>3</sub> ) <sub>3</sub> C-C s C-N-C-NH <sub>2</sub>   | N-[5-(1,1-Dimethylethyl) 1,3,4-thiadiazol-2-yl]- urea              |
| 107                  | (CH <sub>3</sub> ) <sub>3</sub> C-C S C-N-CH <sub>3</sub>     | 2-Dimethylethyl-5-methyl amino-1,3,4-thiadiazol                    |
| 108                  | N — N   | 2-Dimethylethyl-5-amino-<br>1,3,4-thiadiazole                      |